

NO. PD-1445-16

IN THE COURT OF CRIMINAL APPEALS

OF THE STATE OF TEXAS

FILED
COURT OF CRIMINAL APPEALS
6/22/2017
ABEL ACOSTA, CLERK

FRED EARL INGERSON, III	§	APPELLANT
	§	
VS.	§	
	§	
THE STATE OF TEXAS	§	APPELLEE

MOTION FOR SUBSTITUTION OF COUNSEL

TO THE HONORABLE COURT OF APPEALS:

Now comes the Appellant, FRED EARL INGERSON, III, and files this Motion for Substitution of Counsel and, in support thereof, shows the following:

I.

Appellant is currently represented by his retained counsel, Edgar A. Mason. On June 2, 2017, Mr. Mason filed his Motion to Withdraw as Counsel in this matter. On June 12, 2017, Mr. Mason filed his Amended Motion to Withdraw as Counsel in this matter.

II.

Appellant has retained Scott Brown, State Bar No. 03127100, 3100 West 7th Street, Suite 420, Fort Worth, Texas 76107, 817 336-5600, to represent him in this cause of action.

III.

As indicated by their signatures below, Appellant and Mr. Mason approve of this substitution.

IV.

This substitution is not sought for delay only.

WHEREFORE, PREMISES CONSIDERED, APPELLANT prays that the Court enter an order substituting Scott Brown, and discharging Edgar A. Mason, as attorney of record for Appellant.

Respectfully submitted,

/s/Scott Brown
SCOTT BROWN
State Bar No. 03127100
3100 West 7th Street Suite 420
Fort Worth, Texas 76107
Phone: 817 336-5600
Fax: 817 336-5610
sb@scottbrownlawyer.com

Approved as to form and substance:

EDGAR A. MASON
State Bar No. 13153000
6060 N. Central Expressway, Suite 600
Dallas, Texas 75206
Phone: 214 720-9050
Fax: 214 880-0443
edmasonlaw@yahoo.co


FRED EARL INGERSO, III

Approved as to form and substance:


EDGAR A. MASON

State Bar No. 13153000

6060 N. Central Expressway, Suite 600

Dallas, Texas 75206

Phone: 214 720-9050

Fax: 214 880-0443

edmasonlaw@yahoo.co

FRED EARL INGERSON, III

CERTIFICATE OF SERVICE

I certify that a true copy of Appellant's Motion to substitute counsel has been served on June 21, 2017, via email or certified electronic service provider, to:

Hon. Edgar A. Mason
6060 N. Central Expressway, Suite 600
Dallas, Texas 75206
edmasonlaw@yahoo.com

Hon. Stacey M. Soule
State Prosecuting Attorney
P.O. Box 13046
Austin, Texas 78711
information@spa.texas.gov

/s/Scott Brown
SCOTT BROWN

CERTIFICATE OF CONFERENCE

I, Scott Brown, hereby certify that I have spoken with Stacey Soule, State Prosecuting Attorney, and she has no objection to the relief requested in Appellant's Motion for Substitution of Counsel

/s/Scott Brown
SCOTT BROWN